

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

FRANKLIN CONSTRUCTION GROUP, LLC,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	No. 3:24-cv-01255
	)	
WILLIAM SHORE, JWSC, LLC, KEITH	)	JUDGE CRENSHAW
MEADOWS, JOSEPH HEATH, HYDS INC.,	)	MAGISTRATE JUDGE FRENSELY
DEAN BINGHAM, LUNDON JOHNSON,	)	
TYLER WEBER, JOEL CHEVRETTE,	)	JURY DEMAND
DANNY KNOWLES, SCOTT MATTHEWS,	)	
and LOWE’S HOME CENTERS, INC.,	)	
	)	
<i>Defendants.</i>	)	

**DEAN BINGHAM’S MOTION FOR LEAVE TO FILE AMENDED FIVE-PAGE REPLY  
IN COMPLIANCE WITH THIS COURT’S LOCAL RULES**

Pursuant to Local Rules 6.01(a) and 15.01(a), Dean Bingham respectfully moves this Court for leave to file an Amended Reply in Further Support of His Motion to Dismiss (“Amended Reply”). The deadline for Mr. Bingham’s Reply in Support of His Motion to Dismiss (“Reply”) was March 24, 2025. Mr. Bingham filed a Reply on that date, which was stricken from the docket on March 26, 2025, because the Court denied Mr. Bingham’s motion to exceed the page limit by three pages. (*See* Doc. 113.) Mr. Bingham respectfully requests an extension of the deadline for his Amended five-page Reply in compliance with this Court’s Local Rules until March 27, 2025 or, alternatively, until the date that the Court rules on this Motion. If this Motion is granted, Mr. Bingham will file his Amended Reply, which does not exceed the page limitation, and which is attached hereto as **Exhibit 1**.

The undersigned counsel has conferred with Plaintiff's counsel regarding this Motion. Plaintiff's counsel has advised that Plaintiff has not decided whether to object to the Motion and reserves all of its rights at this time.

Respectfully submitted,

/s/ Brooke Sgambati

R. Brandon Bundren (BPR #30985)

Brooke Sgambati (NY Bar No. 5550371)

BRADLEY ARANT BOULT CUMMINGS LLP

1221 Broadway, Suite 2400

Nashville, Tennessee 37203

P: 615.252.4647

F: 615.248.3047

bbundren@bradley.com

bsgambati@bradley.com

*Attorneys for Dean Bingham*

## CERTIFICATE OF SERVICE

I certify that on March 27, 2025, I electronically filed a true and correct copy of the Unopposed Motion to Exceed Page Limitation with the Clerk of Court for the U.S. District Court for the Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below:

<p>Todd E. Panther (tpanther@srvhlaw.com) Christopher C. Sabis (csabis@srvhlaw.com) Thomas B. Hall (thall@srvhlaw.com) SHERRARD ROE VOIGT &amp; HARBISON, PLC</p> <p><i>Counsel for Plaintiff</i></p> <p>Don L. Hearn, Jr. (dhearn@glanker.com) GLANKER BROWN, PLLC</p> <p>Joseph C. Gjonola (jcg@rpnalaw.com) Nadine Alsaadi (na@rpnalaw.com) Nicholas P. Roxborough (npr@rpnalaw.com) ROXBOROUGH POMERANCE NYE &amp; ADREANI LLP</p> <p><i>Counsel for Keath Meadows, Joseph Heath, HYDS Inc.</i></p> <p>Jerry E. Martin (jmartin@barrettjohnston.com) Matthew Edward McGraw (mmcgraw@barrettjohnston.com) Seth Marcus Hyatt (shyatt@barrettjohnston.com) BARRETT JOHNSTON MARTIN &amp; GARRISON, LLC</p> <p><i>Counsel for Keith Meadows and HYDS Inc.</i></p>	<p>Darrick Lee O'Dell (dodell@spicerfirm.com) Nicholas C. Stevens (nstevens@spicerfirm.com) Robert J. Uhorchuk (rju@spicerfirm.com) SPICER RUDSTROM, PLLC</p> <p><i>Counsel for Lundon Johnson, Joel Chevette, Danny Knowles</i></p> <p>Scott D. Carey (scarey@bakerdonelson.com) Gary C. Shockley (gshockley@bakerdonelson.com) Ryan P. Loofbourrow (rloofbourrow@bakerdonelson.com) BAKER, DONELSON, BEARMAN, CALDWELL &amp; BERKOWITZ, PC</p> <p><i>Counsel for Lowe's Home Centers, Inc.</i></p>
---	--

/s/ Brooke Sgambati  
\_\_\_\_\_  
Brooke Sgambati